# FILED FEB 1 5 2000

#### STATE OF INDIANA

### INDIANA UTILITY REGULATORY COMMISSION

		INDIANA UTILITY CECULATORY COMMISSION
N THE MATTER OF THE PETITION OF	)	BRDIANA UTILITI ILLUGILATURI GOMINIOSION
NDIANA BELL TELEPHONE COMPANY,	)	
NCORPORATED d/b/a AMERITECH INDIANA	)	
PURSUANT TO I.C. 8-1-2-61 FOR A THREE	)	CAUSE NO. 41657
PHASE PROCESS FOR COMMISSION	)	
REVIEW OF VARIOUS SUBMISSIONS OF	)	
AMERITECH INDIANA TO SHOW COMPLIANCE	)	•
WITH SECTION 271(c) OF THE	)	
TELECOMMUNICATION ACT OF 1996	)	

## PETITION TO INTERVENE OF TIME WARNER TELECOM OF INDIANA, L.P.

Time Warner Telecom of Indiana, L.P. ("Time Warner Telecom") by counsel, files its Petition to Intervene in the above-captioned proceeding and, in support thereof, states the following:

- 1. Time Warner Telecom is a limited partnership organized pursuant to the laws of the State of Delaware, and is specifically authorized to conduct business in the State of Indiana. Time Warner Telecom is a telecommunications provider, holding a Certificate Of Territorial Authority ("CTA") to provide interLATA, inter-exchange, private line telecommunications service to the public within and throughout the State, to provide intraLATA private line telecommunications service in the Indianapolis LATA, and to provide local services on both a facilities-basis and as a reseller.
- 2. Time Warner Telecom is an "interested party" in any matter pending before the Commission instituted at the behest of any telecommunications carrier concerning competition among telecommunications providers offering or proposing to offer inter-exchange, intra-exchange

and local telecommunications services within the State of Indiana, or in any generic proceeding instituted by the Commission.

- 3. On February 8, 2000, Ameritech filed its Petition in this cause to establish a three phase process for Commission review of various submissions of Ameritech Indiana to show compliance with Section 271(c) of The Telecommunications Act of 1996.
- 4. Decisions made in this cause will directly impact Time Warner Telecom and the competitive choices available to the citizens of Indiana. Time Warner Telecom's intervention is necessary and in the public interest.
- 5. Time Warner Telecom's intervention will not unduly broaden the issues and Time Warner Telecom acknowledges that it will be bound by the record in existence prior to the granting of this Petition.
  - 6. The attorneys representing Time Warner Telecom in this proceeding are:

Pamela H. Sherwood Sommer & Barnard, PC 4000 Bank One Tower 111 Monument Circle Indianapolis, Indiana 46204 (317) 630-4000 E-mail: psherwood@sommerbarnard.com

Marsha Rockey Schermer Time Warner Telecom 250 Old Wilson Bridge Road Suite 130 Columbus, OH 43085 (614) 255-2124 Marsha.Schermer@Tweleran.com

The above-named attorneys are authorized to accept service of papers in the proceeding on the behalf of Time Warner Telecom of Indiana, L.P.

7. This Petition to Intervene is being filed more than five (5) days prior to any date set for the initial hearing in this proceeding.

WHEREFORE, Time Warner Telecom of Indiana L.P. respectfully requests that it be granted leave to intervene and to be made a party to the above-captioned proceeding.

Respectfully submitted,

Pamela H. Sherwood

SOMMER & BARNARD, PC

4000 Bank One Tower

111 Monument Circle

Indianapolis, IN 46204

Attorney for Time Warner Telecom of Indiana, L.P.

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served upon the following by First Class U. S. Mail, postage prepaid, this 15th day of February, 2000:

Sue E. Stemen Ameritech Indiana 240 N. Meridian St., Room 1826 Indianapolis, IN 46204

Karol Krohn
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Pamela H. Sherwood

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